

**SAN FRANCISCO OIL SPILL
PREVENTION AND RESPONSE PLAN**

**AUGUST 1993
(REVISED JANUARY 2007)**

ANNEX K- APPLICABLE MEMORANDUMS OF UNDERSTANDING

Since the City and County of San Francisco is an entity within itself there are no memorandums of understanding needed to provide assistance within San Francisco. There are no applicable memorandums of understanding between the City and GGNRA.

GGNRA and the SFFD have a mutual aid agreement, but there is no specific agreements on handling oil spills, specifically.

Find enclosed the Memorandum of Understanding between the California Dept. of Fish and Game, Office of Oil Spill Prevention and Response and City and County of San Francisco drafted in 1997.

**MEMORANDUM OF UNDERSTANDING (MOU)
RELATING TO
OIL SPILL INCIDENT COMMAND AND MANAGEMENT
BETWEEN THE STATE OF CALIFORNIA,
DEPARTMENT OF FISH AND GAME,
OFFICE OF OIL SPILL PREVENTION AND RESPONSE AND
THE CITY AND COUNTY OF SAN FRANCISCO**

WHEREAS, the Administrator of the Office of Oil Spill Prevention and Response (hereinafter referred to as OSPR) and the City and County of San Francisco (hereinafter referred to as the City) are interested in ensuring a unified and coordinated incident response effort between them through appropriate mutual aid and the coordinated and informed representation within the Incident Command System (ICS) as regulated by the Standardized Emergency Management System (SEMS); and

WHEREAS, the Federal On-Scene Coordinator has the primary authority to direct prevention, removal, abatement, response, containment, and cleanup efforts with regard to all aspects of any oil spill affecting the exclusive economic zone, Federal lands or waters and

WHEREAS, OSPR has the primary State of California authority to direct prevention, removal, abatement, response, containment, and cleanup efforts with regard to all aspects of any oil spill or threatened oil spill in the marine waters of the State and to designate a State Incident Commander (State IC); and

WHEREAS, the State and Federal parties will act in a cooperative and coordinated manner as stipulated in the June 2, 1993 MOU between said parties; and

WHEREAS, OSPR recognizes that local government has the expertise and resources which OSPR will depend on during an oil spill incident; and

WHEREAS, both the Administrator of OSPR and the City share the same goals of protecting California's marine waters and environment and of minimizing any deleterious impacts to public health and safety or the environment; and

WHEREAS, Section 852.60.4 (d) of Title 14 of the California Code of Regulations requires the Administrator to enter into a Memorandum of Understanding with local governments; and

WHEREAS, Section 8574.7 (b) of Title 14 of the Government Code requires a State marine response element that specifies the regional and local planning element which shall provide the framework for the involvement of regional and local agencies in the State effort to respond to a marine oil spill;

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I. PARTIES

The parties to this MOU are the State of California, Department of Fish and Game, Office of Oil Spill Prevention and Response, (hereinafter referred to as OSPR) and the City and County of San Francisco, (hereinafter referred to as the City).

II. PURPOSE OF THE AGREEMENT

The purpose of this MOU is to ensure the Parties respond to an incident in a coordinated, cooperative manner and agree on the specifics of implementing the UC and the Local Plan. **This MOU is the implementing document for the Local Plan.**

III. DEFINITIONS

Parties acknowledge receipt of the Field Operations Guide (FOG), dated 6/96 and the Standardized Emergency Management System (SEMS) Regulations, and agree for the purposes of this MOU the following definitions will apply:

- A. Agency Representative: Individual assigned to an incident from an assisting or cooperating City Department who has been delegated full authority to make decisions on all matters affecting their department's participation at the incident. Agency Representatives report to the Liaison Officer (LO), or to the State IC in the absence of a LO. (There may be several agency representatives from the City that will participate in the MAC Group, examples include representatives from the Port, OES, Health, Rec and Park, DPW or PUC.)

The City's representatives will be notified as indicated in the attached, "Position Paper: OSPR's ICS/UCS Model and SEMS", between the Governor's Office of Emergency Services and the Department of Fish and Game, Office of Oil Spill Prevention and Response. See attachment D.

Major responsibilities of the Agency Representative:

1. Obtains briefing from the LO or the State IC.
2. Ensures that all of their department's resources have completed check-in at the incident through the LO to the Planning Section, Resource Unit Leader.
3. Informs their department personnel on the incident that the Agency Representative position has been filled.
4. Provides input to the planning process on the use of department resources unless resource technical specialists are assigned from the department.

5. Cooperates fully with the State IC and the Command and General Staff on the department's involvement at the incident.
 6. Oversees the well-being and safety of department personnel assigned to the incident.
 7. Advises the LO of any special department needs, requirements or department restrictions.
 8. Reports to department dispatch or headquarters on a pre-arranged schedule.
 9. Ensures that all department personnel and equipment are properly accounted for and released prior to departure.
 10. Ensures that all required department forms, reports, and documents are complete prior to departure.
 11. Has a debriefing session with the LO or the State IC prior to departure.
- B. Field Operations Guide (FOG): The Oil Spill Field Operations Guide, ICS-OS-420-1, 6/96, is a guidance document used in forming a response management system for oil spills.
- C. Liaison Officer (LO)

A member of the Command Staff at the SEMS field level responsible for coordinating with representatives from cooperating and assisting agencies. Local government participants enter into the ICS organization through the LO.

The main role of the LO is to provide an open line of communication between local, State, and Federal agency representatives and the State IC. The LO is the point of contact for those agencies that are assisting with response activities but are not included in the UC. Agency representatives should be kept informed of the incident action plan and its objectives as the incident develops.

Depending on the size of the spill and the extent of spill response activities, the LO and/or one or more Liaison Assistants may be assigned to the scene. At the scene of the spill, the Liaison will coordinate with the various agencies that have input to spill response activities.

Major responsibilities of the LO:

1. Is responsible for communicating the limitations and special needs of the assisting agencies back to the UC. He/she screens local agency

representatives' requests to reduce the burden of time-consuming communications on the State IC.

2. Schedules multi-agency coordination group meetings and keeps agencies informed of the incident's status.
 3. Ensures staff at the scene of the spill should be sensitive to any local issues that develop during the spill response, and bring those issues to the attention of the State IC when appropriate.
 4. May be called upon to contact any of the following local agencies, or may request the Liaison staff at the Department Operations Center (DOC) to make these contacts: Mayor, Local OES Office, Board of Supervisors, Local Plan Coordinator, Police/Sheriff, Fire Department, Local Universities, Public Health, Public Works, Park Districts, Harbor Districts, Port Authorities, Power Plants, Water Intakes, Sewage Treatment Plants, Historical/Cultural contacts.
 5. Maintains a list of assisting and cooperating agencies and Agency Representatives.
 6. May be requested to contact the appropriate agency to provide information to the State IC on specific issues, such as air pollution, monitoring, waste disposal, public health concerns, equipment movement, or the legal and economic implications of curtailing vessel or facility operations.
 7. Provides agency-specific demobilization information and requirements.
 8. Participates in planning meetings, providing current resource status, including limitations and capabilities of agency resources.
 9. Schedules date, time and location for MAC meetings.
- D. Local Government: In this MOU refers to the City and County of San Francisco.
- E. Local Government Representative (LGR): See Agency Representative. One Agency Representative is designated to be the LGR and will advise the State IC in the UC. The initial responding LGR could be replaced with another Agency Representative by the Local MAC Group after the MAC group is established and receives their first briefing.

Major Responsibilities of the LGR:

1. Represents local government(s) as set forth in the MOU.

2. Meets the definition of an Agency Representative.
3. Obtains briefing from the LO or State IC.
4. Assists the LO with notification to other Agency Representative(s) and key local personnel.
5. Provides the LO with pertinent information on the availability of local resources.
6. Upon initial response, works with the LO to establish the local MAC group.
7. Works closely with the State IC in an advisory role while attending meetings.
8. Assists the State IC or Deputy Incident Commander (Deputy IC), in providing the first local MAC group briefing after the MAC group has been established.
9. Provides the MAC's concerns and viewpoints with the State IC to the UC and assists in maintaining information flow between the State IC and MAC group.

F. Local Response Coordinator

Position that has overall responsibility for the City or the National Park Service response to an oil spill. The Local Response Coordinator will be the City's Operations Chief, who would then respond to the Mayor. The Operations Chief would exercise elements of incident command as set forth in the City's Emergency Operation Plan (EOP).

G. Multiagency Coordination Group (MAC)

1. MAC is a cohesive group of all affected agencies established to aid in the overall response, facilitate briefings and share issues during a response.

The MAC group is made up of Agency Representatives and key personnel to review agency policies thus providing valuable input to the State IC. The LGR is the representative of the local MAC group to the State IC in the UC. The MAC group is briefed by the State IC or Deputy IC on a regular basis. The MAC meeting date, time and location are arranged by the LO. The LGR assists in maintaining information flow between the State IC and MAC group.

The Local Government MAC group, after the initial briefing, may select an alternate LGR to represent their issues and concerns. The Local Government MAC group may replace the LGR as their needs dictate. The LGR, however, must meet the definition of an Agency Representative (see LGR Agency Representative definition).

2. The MAC shown in the ICS chart in Attachment A has a broken line going to LGR indicating the UC is receiving input from the Local Government MAC group which is made up of local government people. The line from MAC to Agency Representative indicates that Agency Representatives enter the organization through the LO and also enter into the MAC group (the way that the City's representatives are absorbed into the MAC organization through the MAC Liaison Officer).
- H. Operational Area Level: An intermediate level of the State emergency organization, consisting of a county and all political subdivisions within the county area.
- I. Standardized Emergency Management System (SEMS): As defined in Section 2401 of Title 19 of the California Code of Regulations standardizes response to emergencies involving multiple jurisdictions or multiple agencies. SEMS is intended to be flexible and adaptable to the needs of all emergency responders in California. SEMS requires emergency response agencies use basic principles and components of emergency management including ICS, multi-agency or inter-agency coordination, the operational area concept, and established mutual aid systems.
1. ICS was adapted from the system originally developed by the Firefighting Resources of California Organized for Potential Emergencies (FIREScope) program.
 2. United Command (UC) is a unified team effort which allows all agencies with responsibility of the incident, either geographical or functional, to manage an incident by establishing a common set of incident objectives and strategies. This is accomplished without losing or abdicating agency authority, responsibility or accountability.
- J. State Incident Commander (State IC): State individual responsible for the management of all incident operations. The Administrator of OSPR or his delegate is the State IC for all oil spills in marine waters of the State.
- K. All other terms as defined and used in SEMS and FOG.

IV. INFORMATION SHARING

The exchange of information between the City and OSPR relative to historic pollution events and current risks is necessary to develop appropriate prevention and response systems, to updating and using the Local Plan for response. Communication in the event of an incident is important to coordinated response.

Action:

1. Incident Reporting
 - a. In the event the City is aware of the spill first, the City will contact State OES Warning Center at (800) 852-7550. OES will contact OSPR dispatch at (916) 445-0045. The City may also contact OSPR dispatch.
 - b. In the event OSPR is aware of an incident first, OSPR will contact San Francisco Fire Dept at 415-558-3291 and SFOES at (415) 558-2700.
 - c. After being notified, San Francisco OES will keep in contact with the OSPR, State IC and/or LO to stay informed of the incident's progress and to support the UC's objectives as well as the City's interests. Information sharing will be conducted through integration of City personnel with the UC, in MAC meetings with the UC and/or by telephone and facsimile.
2. City Involvement
 - a. OSPR will notify San Francisco Fire Dept. and San Francisco OES of all oil spill incidents within or with a threat to the county.
 - b. With notification from OSPR, San Francisco Fire Dept. will notify City authorities to determine the appropriate level of City involvement.

V. OIL SPILL RESPONSE PREPAREDNESS

A. PLANNING

The National Contingency Plan (NCP), as amended by the Oil Pollution Act (OPA) of 1990 establishes the response organization within the United States and requires tiered contingency planning efforts. The State, consistent with the NCP, defines its response organization through the State Office of Emergency Services Hazardous Material Incident Contingency Plan and addenda to the Oil Spill Contingency Plan. The City's preparedness document is the Local Plan.

Action:

The City will revise and update the plan as necessary and required and identified in the Local Plan, Annex D, Appendix D.I.1.

B. EXERCISE/DRILLS

(Refer to Local Plan, Annex D, Appendix D.II.B-1)

Government Code 8670.10 addresses coordination and cooperation among agencies on emergency drills.

Action:

As fiscally possible, and with sufficient notice, the San Francisco Fire Department, lead agency for the City and County of San Francisco, intends to attend, participate, observe, evaluate, plan, design, coordinate and generally, be involved with oil spill response drills and exercises within the Area Contingency Plan district. The planning, exercises and drills contact person is:

Assistant Chief Jim Barden
San Francisco Fire Dept.
698 2nd St. .
San Francisco, CA 94107
phone: (415)558-3207

C. MOU DEVELOPMENT CONTACT

For information on the development of this MOU, contact Richard Lee, Sr. Industrial Hygienist, Dept. of Public Health, Bureau of Environmental Health Management at 415-252-3992

VI. RESPONSE

The Incident Command System, as defined by the Standardized Emergency Management Systems (SEMS), will be followed for incident response, per the basic organizational structure with position description and duties located in the Field Operations Guide (FOG), ICS-OS-420-1, 6/96.

The ICS chart in Attachment A and the listing in Attachment C indicate the ICS structure for the City. This chart is consistent with SEMS and illustrates the relationship between local government and UC by including the LGR in the circle with the State IC. Also refer to Attachment D, OES Position Paper, "OSPR's ICS/UCS Model and SEMS"

Actions:

1. Parties agree to use the ICS chart in attachment A for an oil spill clean up response.
2. For responses involving events such as significant health and safety issues, fire, public works issues, police actions, etc., the City may choose to activate the City's ICS as described in attachment C. Coordination with the State's ICS for the oil spill clean up response will occur through the appropriate levels, i.e. Local Response Coordinator, Agency Representative and Liaison Officer.
3. Parties understand that a Local Government Representative (LGR), will participate in the Unified Command. The LGR position is consistent with the intent of SB 872 (concerning local involvement in oil spill response), functions as part of the State's representation in the UC and is designated in this MOU, Attachment B.
4. The City understands the Local Response Coordinator is familiar with the area plan and has full authority to commit, as necessary, appropriate resources under local government control, or to obtain commitments of resources from other local jurisdictions involved. The Local Response Coordinator will use the personnel, equipment and other resources, as described in the Local Plan, and will advise the State IC of availability of these resources.
5. Parties understand for an incident involving multiple jurisdictions in the City operational area, the representative shall be that designated by the MOU unless local government through the MAC Group chooses another. For incidents involving multiple operating areas (i.e., more than one county) the MAC organization shall chose a representative, most likely from the area most impacted. Until such choice is made, OSPR will designate an interim local representative. The LGR will work with the LO to initiate contacts with local agencies and coordinate the first meeting of the MAC group.

6. Parties agree that the State IC in consultation with the LGR and, if applicable, through joint conference, with the Federal OSC shall determine the nature of the local government support needed, and how local government resources identified in the Local Plan may be employed most effectively.
7. The Local Response Coordinator for the County shall advise the appropriate level of local response available and shall notify the State IC.
8. The City is dedicated to providing the resources identified in the Local Plan, Annex F, if available to respond to an oil spill incident. The primary contact to obtain resources is the Agency Representative for each department. (Note: the City cannot commit the National Park Service, Golden Gate National Recreation Area resources. The City can request resources from the NPS for OSPR.)
9. Parties agree that in the event of an oil spill or threatened oil spill in marine waters, the Department of Fish and Game shall conduct an initial on-scene assessment of the spill and review of measures being taken by the responsible party and determine the appropriate level of response. Upon completion of the initial assessment, the State IC through joint conference with the Federal OSC as applicable, shall notify the LGR and advise as to the following:
 - a. potential health and/or safety risk to residents
 - b. type of product discharged
 - c. estimated amount of product discharged
 - d. location of product discharged
 - e. name of the designated responsible party, if known
10. The parties agree the City must satisfy the following four (4) conditions on an on-going basis to participate in the UC Structure:
 - a. Complete a Local Government Oil Spill Contingency Plan Element which meets the requirements of Government Code Section 8670.35 and all the implementing regulations, to fully satisfy this conditions; and
 - b. Remain in compliance with all implementing regulations which may postdate this MOU; and
 - c. Participate in the Port Area Planning Process of the U.S. Coast Guard; and
 - d. Recognize the authority of the Federal OSC and the State IC as prescribed by law, to issue orders and direct the responsible party.

VII. FUNDING

A. Oil Spill Funds

Funds are available from several sources to cover costs associated with oil spill response activities. Among these are funds from the designated responsible party of the spill, the Federal Oil Spill Liability Trust Fund (33 U.S.C. 2701 et.seq.), and the State Oil Spill Response Trust Fund (Government Code Section 8670.46). It is the responsibility of the incident Finance Chief, in consultation with the UC to determine the appropriate fund(s) to finance the costs of the incident.

Working within the Incident Command System (ICS) structure, the OSPR acts as the coordinator for all State and local agency cost recovery claims. A packet of information containing examples and guidelines for preparation of incident costs is available through the OSPR Cost Recovery Coordinator, Financial Programs, OSPR telephone number (916) 445-9338.

Action:

1. The City understands that if reimbursement for authorized response and removal actions is desired, the funding procedures and policies outlined in the San Francisco Bay/Delta Area Contingency Plan, Annex C, Appendix I, "Spill Funding Procedures" will be followed.
2. The City agrees that the Incident cost documentation to support all items of expense shall be prepared and submitted timely, according to the appropriate reimbursement mechanism utilized (see San Francisco Bay/Delta Area Contingency Plan, Annex C, Appendix I, "Spill Funding Procedures."

B. Local Government Funding

The Oil Spill Contingency Plan Element Grant Program is authorized by Sections 852.60-852.65 of Title 14 of the California Code of Regulations.

Action:

1. The City will continue to participate in the Grant Program by attending area planning meeting, drills and by continuing to update the Local Plan and participate in updating of the area plan.
2. The City will put in a request with OSPR if the City wants to be notified of all major drills.

3. The City will submit invoices in order to receive grant money.

C. SEMS & IC Integration

The City agrees to integrate the ICS, following SEMS and OSPR ICS/UC guidelines to qualify for reimbursements.

VIII. PERMITTING

Government Code 8574.7 (c) (8) requires the plan to include an assessment of how activities that usually require a permit from a state or local agency may be expedited or issued by the administrator in the event of an oil spill.

The California Coastal Act specifies that in the event of a spill, a responsible party may be required to obtain an emergency permit either from local government (provided it has coastal permitting authority), or the Coastal Commission for all response activities which constitute development in the coastal zone. If these activities take place on private or public land other than land owned by the responsible party, the affected landowner may be required to join in the permit. Any permanent facilities constructed in the coastal zone as part of pre-spill preparedness activities are subject to standard permitting requirements.

Emergency permits may be required for activities such as road grading, excavation, etc., as well as for temporary storage sites and staging areas. The permitting process for emergency response initiates with the City requesting permits from the various Federal and State agencies.

Action:

1. Parties agree to obtain all needed permits as quickly as possible to expedite the spill cleanup.
2. The City Agency Representative will identify individuals within the City responsible for issuing permits and will discuss procedures with them prior to a spill in order to avoid delays during a response.
3. The City Agency Representative will work with the responsible party or State IC to obtain permits during a spill. The local agencies the City will work with are as follows:
 - a. For Hazardous Waste Temporary Storage and Disposal Sites Permitting:

Cal-EPA, Dept. of Toxics Substances Control
Telephone 1-800-618-6942
24- hour Telephone: 1-800-852-7550

California Coastal Commission/Bay Conservation and Development
Commission
Telephone: (415)904-5250

b. For Solid Waste Permitting:

San Francisco Dept. of Public Health
Bur. of Environmental Health Management
Telephone: (415)252-3800
Fax (415) 252-3964

c. For Road and Construction Permitting:

San Francisco Department of Building Inspection
1660 Mission St.
Central Permit Bureau
415-558-6070

d. For Other Permitting

As needed, obtain from or initiate through the above City Departments.

IX. PROVISIONS OF UNDERSTANDING

The Parties understand that:

1. This MOU represents a voluntary understanding between the Administrator of OSPR and the City.
2. This MOU will govern all response management activities during a marine oil spill or threatened marine oil spill whenever either affects public health, public safety, and the environment.
3. This MOU further entitles the City to be eligible for consideration for continued grants for drills, training, exercises and participation in the area planning process and Local Plan revisions, as appropriate.
4. This MOU recognizes and incorporates fully by reference, the Local Plan submitted by the County and approved by OSPR on August 1993, and updated November 1995. The Local Plan will be updated again in 1997.
5. In the event that individual and severable portions of this agreement are found to be in conflict with either State or Federal law, regulations or policies and therefore of no effect, this Memorandum of Understanding will remain in effect without those provisions unless either Party notifies the other in writing that the entire agreement is terminated.
6. The terms of this MOU may be changed at any time by the Parties by a written, signed amendment hereto with or without notice to any other person. Upon review of the Oil Spill Plan Element, pursuant to Section 852.611.11 (j) of Title 14 of the California Code of Regulations, the grant recipient shall notify the Administrator of any significant changes in the Oil Spill Contingency Plan Element that will alter the terms of this MOU and this MOU shall be modified accordingly. At a minimum, the MOU will be reviewed and updated, concurrent with Local Plan updates to assure that all information contained therein remains reasonably current and mutually acceptable to the parties. The Local Response Coordinator will be named in the Local Plan and any subsequent amendments.
7. This MOU may be terminated by either party upon thirty (30) days written notice.

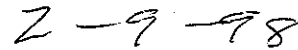
San Francisco/OSPR Oil Spill MOU

The City has signed a resolution making the City an Operational area. The following signature for the City is in behalf of the City.

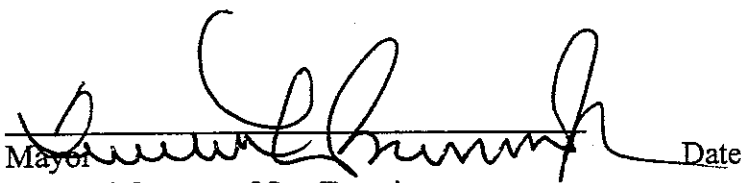
I have read the San Francisco Oil Spill Contingency Plan Element, and am aware of the resources being referenced herein.



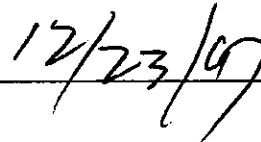
Pete Bontadelli, Administrator
State of California, Department of Fish and Game
Office of Oil Spill Prevention and Response

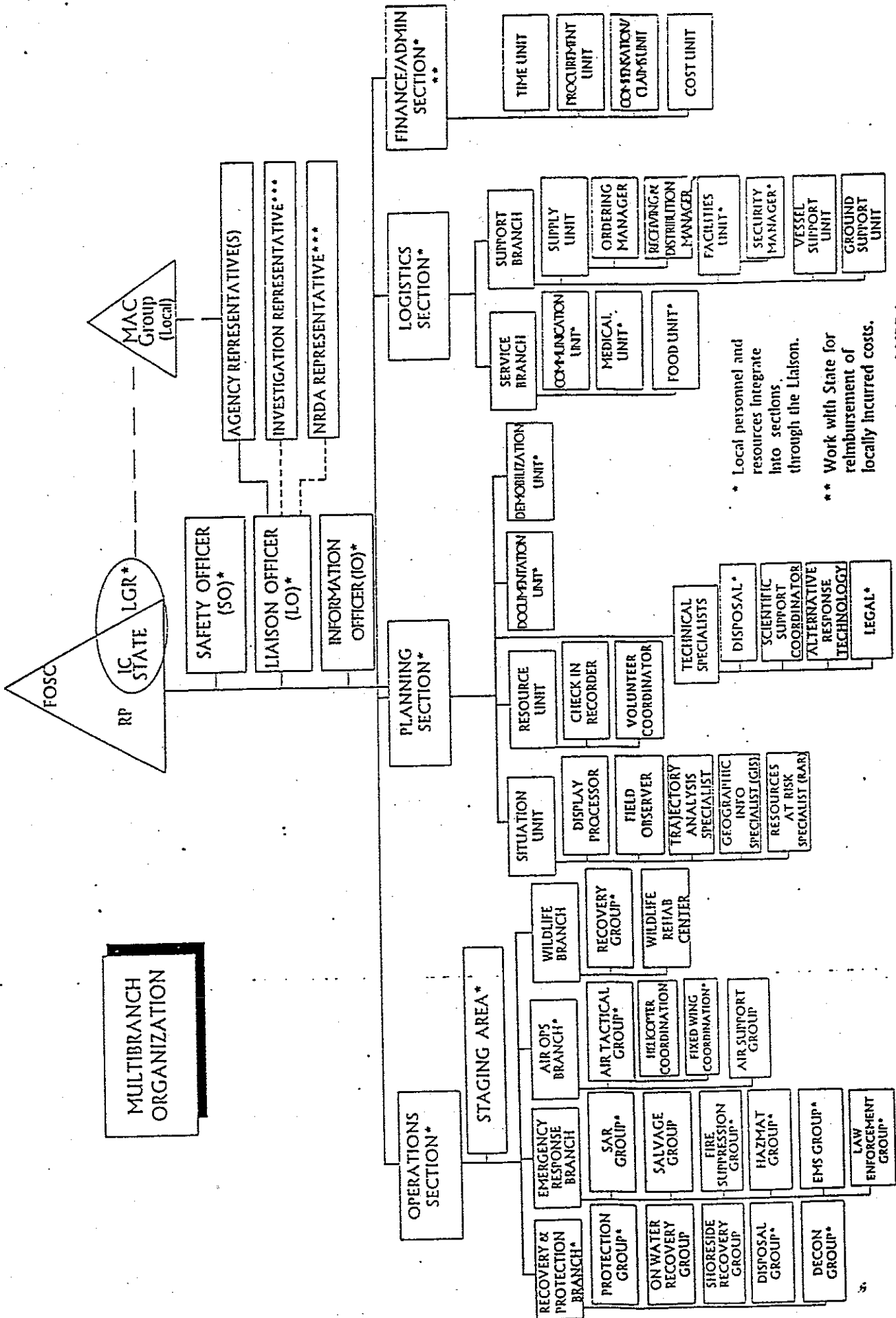


Date



Mayor _____ Date _____
City and County of San Francisco





ATTACHMENT B

LOCAL RESPONSE COORDINATORS

The Local Response Coordinators (or Agency Representative) for the City and County of San Francisco will be the on-duty Fire Battalion 2 Chief. They can be reached by calling 415-558-3236 or Fire Dispatch at 415-861-8020.

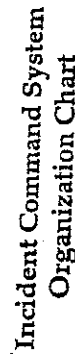
The Local Response Coordinator (or Agency Representative) for the National Park Service, Golden Gate National Recreation Area is the on Duty Asst. Fire Chief.

Frank Rihtarshich 415-561-5136

William Delaplaine 415-561-5135

Curtis Troutt 415-561-5135

All can also be reached through the GGNRA Communications Center (415) 561-5505



ATTACHMENT D

Position Paper: OSPR's ICS/UCS Model And SEMS

Author: Adam Sutkus
Senior Emergency Operations Planner
Governor's Office of Emergency Services

August 14, 1996
(Version #2)

Primary Assertion: The Office of Oil Spill Prevention and Response (OSPR) ICS/UCS model is consistent with Standardized Emergency Management System (SEMS) principles and practice.

Issue #1: Unified command participation by local government in an oil spill.

SEMS incorporates the Incident Command System (ICS), including unified command (UC). Under ICS, the Incident Commander is from the organization with direct authority for an incident (e.g., county health departments prevent and mitigate health threats to citizens, and OSPR prevents and mitigates marine oil spills). SEMS defines the unified command structure as "...a unified team effort which allows all agencies with responsibility for the incident, either geographical or functional, to manage an incident by establishing a common set of incident objectives and strategies. This is accomplished without losing or abdicating agency authority, autonomy, responsibility or accountability." A unified command thereby allows different agencies with overlapping areas of jurisdiction to efficiently work together. They can accomplish their individual missions, while supporting the overall incident goal.

An impacted local government has both geographical (city or county property) and functional (citizenry health and safety) responsibilities, and therefore must be appropriately involved as part of the UC. Correspondingly, state law requires the OSPR Administrator to perform as the Governor's representative and "has the primary authority...with regard to all aspects of any oil spill in the marine waters of the state." OSPR's oil spill response model facilitates local participation in the unified command through the lead state agency (OSPR), essentially creating a state/local partnership within the UC. Given that OSPR has defined that local governments will be directly involved with the UC as participants (or as incident commander if health and safety issues are involved), the geographical and functional authority for local participation in the unified command has been realized.

Issue #2: SEMS response hierarchy usage during an oil spill.

The SEMS approach to increasing resource assistance consists of five levels of governmental response: field, local government, operational area, region, and state. In all emergency events, resources are received from the next organizational level when the needs of the response exceed that level's ability to handle the incident. State law recognizes the complexity of dealing with a marine oil spill and places lead authority immediately at the

state level. By definition, this direct application of state level assistance essentially "escalates" aid for a marine oil spill through the SEMS levels instantaneously, bypassing the need to request help at each individual tier. Put another way, state and federal marine oil spill resources are already considered part of the incident-level response under SEMS since they are mandated under law. Thus, OSPR's marine oil spill resources are available immediately at the local level.

SEMS supports all response efforts underway during a marine oil spill response. If any non-marine oil spill resources are required at the incident, or the impacts of the event spread beyond the marine environment, the appropriate level of SEMS - local government, operational area, region, etc. - will be accessed (examples where this may apply include: mass casualties, evacuation needs, sheltering, etc.). During a significant marine oil spill incident, all standard SEMS coordination procedures must be followed by involved personnel. For instance, a local Emergency Operations Center (EOC) and Operational Area EOC will activate; the State OES Regional EOC (REOC) and State Operations Center (SOC) will operate in whatever capacity is required. Local or Operational Area EOCs will coordinate closely with the oil spill incident command post. In the case of fire, rescue, and other health and safety issues, local government will operate as IC and rescue activities would take place as a priority over oil spill response. A smooth transition from health/safety emergency response (locals as IC) to marine oil spill cleanup and abatement (unified command) is key.

Issue #3: Oil spill response use of multi-agency or inter-agency coordination.

SEMS defines the multi-agency or inter-agency element of the ICS as follows: "multi-agency or inter-agency coordination means the participation of agencies and disciplines involved at any level of the SEMS organization working together in a coordinated effort to facilitate decisions for overall emergency response activities, including the sharing of critical resources and the prioritization of incidents." Oil spills require specific application of ICS and multi-agency coordination principles, utilizing the flexible nature of the SEMS response system. Both OSPR's California oil spill Field Operations Guide and local government Memorandum of Understanding address the use of multi-or inter-agency coordination in a manner consistent with SEMS.

Issue #4: Integration of Local EOC into field-level oil spill response activities.

During a major oil spill incident, a local EOC will open and operate in support of an ongoing field-level response as it does for any emergency situation. Given that oil spills mandate state and federal involvement immediately at the field response level, local governments will participate along with other agencies throughout the ICS structure. Local government personnel will be utilized under operations, planning/intelligence, logistics, and finance - according to local expertise. OSPR's MOU with each coastal local government will determine, in more detail, which slots will be filled by whom. Additional local involvement will be found within the liaison staff (in the "multi-agency coordination group") and the unified command, as necessary. From each of these positions, direct communication with corresponding departments and the local EOC will be ongoing. As requests are directed at local personnel within the field-level ICS structure, assistance will be received via the local EOC (or other SEMS level) to satisfy the request.